

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
DEC 17 2024
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

SARAH BUNTURA,
Plaintiff,

v.

FORD MOTOR COMPANY, et al.,
Defendants.

Case No. 1:24-cv-01811

Judge J. Philip Calabrese

PLAINTIFF'S MOTION FOR LEAVE TO FILE MOTION TO RECONSIDER INSTANTER

Plaintiff, Sarah Buntura, respectfully moves this Honorable Court for leave to file her **Motion to Reconsider Instanter** pursuant to **Federal Rule of Civil Procedure 59(e)** and **Rule 60(b)**. Plaintiff submits this request to address **procedural unfairness** and clarify arguments and evidence that the Court's prior ruling overlooked.

I. Good Cause Exists for Filing Instanter

1. Premature Ruling Prevented Filing of Supplemental Memorandum

On **December 13, 2024**, Plaintiff filed her **Motion to Vacate Judgment**, but it was not docketed until after **3:00 PM** that day, as confirmed by the Clerk's Office. Recognizing the need to clarify arguments and present additional evidence, Plaintiff prepared a **Supplemental Memorandum**.

On **December 16, 2024**, at **5:56 AM**, Plaintiff emailed the Clerk's Office to inform them of her intent to file the Supplemental Memorandum later that day. **Despite this notice**,

the Court issued its ruling denying Plaintiff's Motion to Vacate **before the Supplemental Memorandum could be filed and considered.**

2. Procedural Fairness and Manifest Injustice

The Court's ruling foreclosed Plaintiff's ability to present **material clarifications and key evidence** supporting her claims. The premature ruling creates **procedural unfairness**, particularly for a **pro se litigant** entitled to leniency under *Haines v. Kerner*, 404 U.S. 519 (1972), and *Erickson v. Pardus*, 551 U.S. 89 (2007). **Denying leave to file** would result in **manifest injustice** by depriving Plaintiff of the right to **fully and fairly present her claims.**

3. Plaintiff's Filings Are Made in Good Faith

Plaintiff has acted **diligently and respectfully** throughout this matter. Her **Motion to Reconsider** raises **substantive legal and factual arguments**, including issues of procedural fairness, mischaracterization of claims, and systemic concerns. This motion is filed in **good faith** to ensure that all relevant arguments are **properly heard and considered**

II. Relief Requested

For the foregoing reasons, Plaintiff respectfully requests that this Court:

1. **Grant leave to file the Motion to Reconsider Instantly;**
2. **Accept the attached Motion to Reconsider for immediate consideration; and**
3. **Provide any further relief this Court deems just and proper.**

Respectfully submitted,


Sarah Buntura

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Brunswick, OH 44212

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PLAINTIFF'S NOTICE OF NEW EVIDENCE AND EXHIBITS

Plaintiff, Sarah Buntura, hereby submits the following evidence in support of her **Motion for Leave to File Motion to Reconsider Instantly and Motion to Reconsider:**

EXHIBIT INDEX

1. **Exhibit A: Motion to Reconsider**
Supporting Plaintiff's request for reconsideration of the Court's dismissal.
Number of Pages: 6
2. **Exhibit B: NLRB Charge Against Employer (Ford Motor Company)**
Case No. 08-CA-346075.
Supporting Plaintiff's statement regarding Ford's unfair labor practices.
Number of Pages: 2
3. **Exhibit C: Letter Confirming Docketing of NLRB Charge**
From the Regional Attorney – Case No. 08-CA-346075.
Supporting Plaintiff's claims in the Supplemental Memorandum.
Number of Pages: 3

CERTIFICATION Plaintiff certifies that the above-listed evidence is submitted in good faith to substantiate the claims raised in her **Motion for Leave** and **Motion to Reconsider**.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sarah Buntura", with a large, stylized loop at the beginning.

Sarah Buntura
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sarahbuntura@gmail.com